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9 **UNITED STATES BANKRUPTCY COURT**  
10 **EASTERN DISTRICT OF CALIFORNIA**

11 IN RE:  
12 DOUGLAS PAUL RICE AND SAMANTHA  
13 MARIE RICE,  
14 DEBTORS.

15 Bankruptcy Case No.: 2022-10735

16 Chapter 7

17 DMG-2

18 **APPLICATION TO EMPLOY SPECIAL COUNSEL FOR THE CHAPTER 7**  
**TRUSTEE**

19 TO THE HONORABLE JENNIFER E. NIEMANN, UNITED STATES  
20 BANKRUPTCY JUDGE:

21 Chapter 7 Trustee Jeffrey Vetter ("Trustee") represents as follows:

22 1. Debtors filed a voluntary petition under Chapter 7 of the United States Bankruptcy  
23 Code on April 29, 2022. Jeffrey M. Vetter is the Chapter 7 Trustee in this case.  
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25 2. Among the assets of the re-opened Chapter 7 estate is a claim against Amazon or wage

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and/or other employment claims

3. After review of the matter, the Trustee is informed and believes that at a portion of any recovery is in the lawsuit is property of the Debtor's Chapter 7 estate. A true and correct copy of the complaint filed on behalf of the Debtor against Amazon and others is filed concurrently herewith as Exhibit "A". Therefore, the Trustee files this Application seeking the employment of Rahul Sethi as special counsel to the Chapter 7 Trustee.

4. Sethi's responsibilities as special counsel for the Trustee will be:

a. to advise and consult with the Trustee during the prosecution of the lawsuit filed against Amazon; and

b. to prepare such pleadings, motions, notices, and orders as are required for the prosecution of the lawsuit filed against Amazon.

5. While representing the Debtor, the Trustee does not believe that Sethi has an interest adverse to the Trustee, or the estate in any of the matters upon which he is to be engaged, and Trustee believes that the employment of Sethi will be in the best interest of the estate. A true and correct copy of a contingency agreement outlining the terms of Sethi's compensation is filed concurrently herewith as Exhibit "B". Approval of compensation to Sethi will be sought separately when the matter is resolved.

6. Based upon the Declaration of Rahul Sethi filed concurrently with this Application, the Trustee believes that Sethi does not hold or represent an interest adverse to that of the Trustee. Trustee believes that Sethi is a disinterested person within the meaning of 11 U.S.C. Section 101(14) and has no connection with Debtor, Trustee, Debtor's creditors, parties in interest, their attorneys and/or accountants, the United States Trustee, or any person employed by

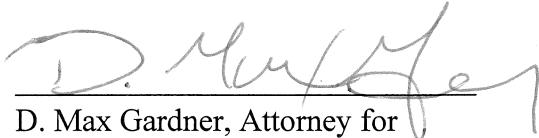
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1 the Office of the United States Trustee, except as may be set forth in the Declaration of Rahul  
2 Sethi filed concurrently with this Application.

3 7. Sethi is willing to be employed by the Trustee as special counsel pursuant to the terms  
4 of the engagement letter referenced herein. Compensation will be paid to Sethi after Court  
5 approval. It is also anticipated that a motion to approve compromise consistent with the  
6 provisions of Bankruptcy Rule 9019 will be sought by the Trustee to obtain approval of the  
7 disbursement of any monetary judgment obtained through trial or settlement of the lawsuit.  
8

9 WHEREFORE, Trustee requests that he be authorized to employ Rahul Sethi as his  
10 attorney of record to render service in the areas described above with compensation to be paid as  
11 an administrative expense in such amounts as the Court may hereinafter determine and allow.  
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13 Dated: June 14, 2022

  
14 D. Max Gardner, Attorney for  
15 Chapter 7 Trustee Jeffrey M. Vetter  
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